



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St., Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

November 1, 2007

Mr. Lesley W. Thompson, Forest Supervisor
Lewis and Clark National Forest
1101 15th Street North,
P.O. Box 869
Great Falls, MT 59403-0869

Re: CEQ 20070414; Rocky Mountain Ranger District
Travel Management Plan Final EIS and Birch Creek
South Record of Decision

Dear Mr. Thompson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) for the Rocky Mountain Ranger District Travel Management Plan, and the Record of Decision (ROD) for the Birch Creek South portion of the analysis area.

The EPA understands the complexities and challenges associated with developing a Travel Management Plan that balances motorized and non-motorized public recreation, while providing for land management and protection of aquatic and terrestrial resources and ecosystems. We recognize that there are many user groups and interests, and social, economic and environmental effects and trade-offs that need to be considered and balanced during decision-making. We appreciate the efforts of the Lewis & Clark National Forest in evaluating and considering many factors and viewpoints in its effort to make travel management decisions that balance the many trade-offs in the various geographic areas.

EPA's preferred alternative for travel management was Alternative 3, since we believe it best addressed concerns about impacts of roads and motorized travel on water quality, fisheries and wildlife, and Alternative 3 also appeared to result in less potential conflict between recreational uses. However, we do not object to your selection of Alternative 4 with modifications for the Birch Creek South portion of the travel management analysis area. Alternative 4 with modifications appears to reduce overall motorized uses and mileage of open motorized routes and areas open to snowmobile use, and accordingly is likely to reduce adverse impacts to water quality, fisheries and wildlife associated with motorized uses. We are pleased that the FEIS and ROD evidences good understanding of the unique wild and remote setting and abundant wildlife resources available on the Rocky Mountain District, and states that non-motorized recreational opportunities such as solitude, wildlife viewing, hiking, backcountry hunting, fishing, horseback riding and pack trips would be emphasized.

We believe it is important that motorized activities be properly managed and controlled so that they occur in a manner and location that is consistent with protection of the environment and other resources in order to sustain and protect the environment, other resources, and ecosystems for use by future generations. We are concerned that the demand for recreation opportunities, particularly motorized recreation, may be exceeding the capability of the land and resources to provide them in a manner that is consistent with resource and ecosystem protection.

We are also pleased that the type of and season of use allowed on many roads and trails will be changed to allow limited maintenance funds to be prioritized for use on trails causing water quality impacts. However, we are concerned that the FEIS indicates that road/trail maintenance and adequate funding for road/trail maintenance is outside the scope the analysis. Roads are often a primary source of human-caused sediment increases, and sediment yields are generally higher from roads than from trails, and from motorized trails than from non-motorized trails. Roads/trails often tend to become wider and rutted with heavy motorized use, creating a greater need for monitoring of road/trail conditions, and for road and trail maintenance for repair and erosion control. Motorized uses are more likely to accelerate erosional processes and worsen poor road conditions, and increase stream sedimentation and degradation of fisheries habitat. We believe the condition of roads and trails and the Forest's ability to properly maintain roads and trails should be considered in determining roads and routes designated open to motorized uses, and thus, should be within the scope of the analysis.

We also want to emphasize the importance of adequate funding to implement needed road maintenance, road BMP improvements, and road decommissioning. The FEIS indicates that only the most heavily used roads receive maintenance. We believe all roads should be maintained, and that road networks should be limited to those that can be adequately maintained within agency budgets and capabilities, and if roads cannot be properly maintained we believe they should be closed and/or decommissioned. We are concerned that funding for road and trail maintenance, which is already inadequate to address the significant road maintenance backlog, is being reduced further.

We note that some streams in the analysis area are water quality impaired and listed on Montana's Clean Water Act Section 303(d) list (e.g., Blackleaf Creek, Sun River, Teton River, Dearborn River, Birch Creek, Ford Creek, SF Badger Creek, SF Dupuyer Creek, SF Two Medicine River, Willow Creek). It is important that the Forest Service management be consistent with efforts to promote restoration of water quality and beneficial use support in impaired streams.

We also want to emphasize the importance of adequate funding and budgets for Travel Plan enforcement to promote compliance with use restrictions that protect against erosion, transport of sediment to streams, spread of noxious weeds, and degradation of terrestrial and aquatic habitat in environmentally sensitive areas. A Travel Management Plan is of little consequence unless it is enforced. Finally, we want to state that we look forward to reviewing the Record of Decision for the Travel Management Plan for the Badger-Two Medicine area when it is available.



We appreciate the opportunity to review this Travel Management Plan and EIS during the NEPA process. If you have any questions you may contact Mr. Steve Potts of my staff in Helena at (406) 447-5022 or in Missoula at (406) 329-3313, or via e-mail at potts.stephen@epa.gov . Thank you for your consideration.

Sincerely,

/s/ John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA, 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena